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(Complete list of counsel for Defendant on
signature page)

11
12 **UNITED STATES DISTRICT COURT**
13
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

16 FINJAN, INC., a Delaware Corporation,

17 Plaintiff,

18 vs.

19 SONICWALL, INC., a Delaware Corporation,

20 Defendant.

Case No. 5:17-cv-04467-BLF-HRL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES**

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Finjan, Inc. (“Finjan”) and Defendant
2 SonicWall, Inc. (“SonicWall”) (collectively, “the Parties”), hereby jointly stipulate and respectfully
3 request that the Court amend the case schedule.

4 In support of these stipulated requests, the Parties jointly state as follows:

5 WHEREAS, the COVID-19 pandemic has impacted the daily business operations of both
6 parties and their respective counsel;

7 WHEREAS, in light of the COVID-19 pandemic, the parties have conferred and agreed
8 that, subject to the Court’s approval, the case schedule should be amended as set forth below in
9 order to account for the uncertainties surrounding the pandemic and to provide for the orderly
10 conclusion of fact discovery;

11 WHEREAS, the parties’ proposed modifications to the case schedule do not impact the
12 dates already set by the Court for the summary judgment hearing and trial in this case, and only
13 modify the dates for the conclusion of discovery and summary judgment briefing;

14 WHEREAS, the Parties previously stipulated to and/or the Court ordered: an extension of
15 SonicWall’s time to respond to the Complaint by thirty days, on September 8, 2017 (Dkt. No. 16);
16 an extension of time to complete mediation pursuant to ADR L.R. 6-4(c) on January 31, 2018 (Dkt.
17 No. 58); a continuance of the hearing on SonicWall’s Motion to Dismiss on March 27, 2018 (Dkt.
18 No. 67); a further extension of time to complete mediation pursuant to ADR L.R. 6-4(c) on April
19 3, 2018 (Dkt. No. 71); a modification of the case schedule, pursuant to Civil Local Rule 7-12 and
20 the Court’s instructions at the December 14, 2017 Initial Case Management Conference (Dkt. No.
21 90); a further extension of time to complete mediation pursuant to ADR L.R. 6-4(c) on January 31,
22 2018 (Dkt. No. 58); an extension for Finjan’s Opposition to SonicWall’s Motion to Compel Further
23 Supplemental Infringement Contentions and SonicWall’s Reply in support of its Motion to Compel
24 Further Supplemental Infringement Contentions (Dkt. No. 116); a further extension of time to
25 complete mediation pursuant to ADR L.R. 6-4(c) on May 2, 2019 (Dkt. No. 140); an extension of
26 time for both parties to provide hit counts for any email requests served under the ESI, for
27 SonicWall to provide its opposition to and for Finjan to provide its reply brief in support of Finjan’s
28

1 Motion for Leave to Amend Its Infringement Contentions (Dkt. No. 219); and a limited enlargement
 2 of the then-current deadlines to complete noticed fact depositions, any follow-up discovery from
 3 those depositions and to serve expert reports (Dkt. No. 244);

4 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among
 5 counsel for Finjan and SonicWall that the deadlines set forth below be amended as follows:

Event	Current Deadline	Proposed Amended Deadline
Close of Fact Discovery	5/1/2020 6/1/2020 (for depositions and follow up discovery)	7/31/2020
Joint status report about whether products can be grouped together into categories for the purposes of trial	5/6/2020	8/5/2020
SonicWall to limit the number of invalidity theories to 30 total	5/6/2020	8/5/2020
Opening Expert Reports	7/10/20	9/4/2020
Rebuttal Expert Reports	8/7/20	10/5/2020
Close of Expert Discovery	9/18/2020	11/3/2020
Opening Summary Judgment Briefs	10/30/2020	11/20/2020
Responsive Summary Judgment Briefs	11/27/2020	12/9/2020
Reply Summary Judgment Briefs	12/4/2020	12/23/2020

1 Respectfully submitted,

2 By: /s/ Paul Andre

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20 Respectfully submitted,

21 By: /s/ Matthew C. Gaudet

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ATTESTATION

In compliance with Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: April 1, 2020

/s/Paul Andre

[PROPOSED] ORDER

Pursuant to the parties' Stipulation, it is hereby ordered that the deadlines set forth below are extended as follows:

Event	Amended Deadline
Close of Fact Discovery	7/31/2020
Joint status report about whether products can be grouped together into categories for the purposes of trial	8/5/2020
SonicWall to limit the number of invalidity theories to 30 total	8/5/2020
Opening Expert Reports	9/4/2020
Rebuttal Expert Reports	10/5/2020
Close of Expert Discovery	11/3/2020
Opening Summary Judgment Briefs	11/20/2020
Responsive Summary Judgment Briefs	12/9/2020
Reply Summary Judgment Briefs	12/23/2020

IT IS SO ORDERED.

Dated: _____

JUDGE BETH LABSON FREEMAN
United States District Court Judge